




8. There are 398 numbers from the Special Master List that appear in the Corecivic data but not the Securus Data.
9. There are 52 additional numbers from the Special Master list that appear on Securus data, but not Corecivic call records.
10. I have been provided several bar directories from Kansas, Nebraska, Iowa, Missouri and the Kansas City Metropolitan Bar Association.
11. An additional 38,243 phone numbers appear on these lists, but do not appear on the Special Master list.
12. From that list of additional phone numbers, 13,315 additional phone calls were made to numbers that did not appear on the Special Master List to 580 distinct phone numbers.
13. Corecivic's records do not have a field that indicates whether a call was recorded.
14. I have been provided additional records, including what was described to me as copies of requests for privatization from attorneys, Detainees (beginning in October 2016), and one-time attorney requests for attorney/client phone calls.
15. 215 of these phone numbers appear on the Special Master list
16. 24 of these phone numbers do not appear on the Special Master list.
17. Based on Corecivic's records, 362 separate phone calls were placed to phone numbers identified through privatization requests, but do not appear on the Special Master list.
18. Based on Securus's call records, 7,914 calls were recorded to numbers that were identified through Detainee and Attorney Requests for privatization (that also appear on the Special Master List, and were therefore produced by Securus in their CDRs).
19. From those 7,914 calls identified above, based on Securus's call records that have a field that identifies whether a call was recorded, 203 separate phone calls to a number appearing on the Special Master list were recorded after either a Detainee or Attorney had requested privatization or identified themselves as an attorney through Corecivic's document production.
20. 14 separate instances occurred of both attorneys and detainees requesting privatization of the same phone number.
21. From those lists, 546 unique numbers appear on the Corecivic privatization reports.

22. 356 unique numbers from the Corecivic privatization lists appear on the Special Master list.
23. 190 unique numbers from the Corecivic privatization lists do not appear on the Special Master Report.
24. From the numbers that appear on Corecivic privatization lists, Securus Call Detail Reports reflect 9,438 recorded calls to those 356 numbers.
25. 2,413 of the 9,438 calls, were recorded after the earliest date of privatization appearing in the Corecivic privatization lists.
26. Corecivic call records indicate 5,817 phone calls placed to the numbers in the Corecivic privatization lists that do not appear on the Special Master Report.
27. I was given a separate list of what was described to me as 133 separate Federal Public Defender Phone Numbers.
28. From the group of numbers identified in paragraph 27, at least 2,134 phone calls were recorded from calls placed to Federal Public Defenders, based on Securus call records.
29. Securus privatization records contain 161 unique records of attorney phone numbers appearing on the Special Master Report.
30. From the Securus privatization reports, 1,627 phone calls were recorded after the first privatization event.

Pursuant to 42 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct and that I have personal knowledge of the information provided above.

Executed this 24th Day of May, 2018

  
Nicholas Harris